



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Waste Management Division
RCRA Enforcement Office

Purpose: RCRA Compliance Evaluation Inspection

Facility Name: Foasberg Laundry

Facility Location: 3337 E. Broadway
Long Beach, CA 90803

Facility Mailing Address: Corporate Office
640 E. Wardlow Rd.
Long Beach, CA 90807 (562) 426-7345
(562) 595-9693 fax

EPA ID Number: CAD 980 813 406

Date of Investigation: November 5, 2003

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DTSC Representative(s): None

CUPA Representative(s): None

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Report Prepared By: Ronald Brown

Date of Report: December 18, 2003

INTRODUCTION

On November 5, 2003, U.S. Environmental Protection Agency (U.S. EPA) inspectors Ron Brown and Cameron McDonald conducted a hazardous waste inspection of Foasberg Laundry, located at 3337 E. Broadway, Long Beach, California ("Foasberg" and the "facility").

The purpose of the inspection was to determine the facility's compliance with applicable federal and state hazardous waste statutes and regulations, i.e., the Resource Conservation and Recovery Act (RCRA), as amended; the implementing regulations adopted in the Code of Federal Regulations (CFR), Title 40, Parts 260-266, 268, 270, 273 and 279; the California Health and Safety Code (HSC), Division 20, Chapter 6.5; and the California Code of Regulations (CCR), Title 22, Division 4.5.

Inspectors conducted a physical inspection of the facility and reviewed records related to hazardous waste activities at the facility. Facility representatives met with the inspectors, accompanied them during the physical inspection of the facility, and provided the records requested during the inspection or submitted them later to the inspectors' office in San Francisco. An exit briefing summarizing the inspection results was held with facility representatives.

FACILITY BACKGROUND

The facility is one of a privately-owned chain of three laundries in Southern California. The facility provides commercial and retail services, and dry cleaning services in the industrial, health care and retail sectors. Approximately 15 people work in "production", one shift 5 days/week. Three people handle hazardous waste at the facility.

According to facility representatives during the inspection, the facility is inspected yearly for compliance with hazardous waste regulations by the City of Long Beach.

INSPECTION

After providing introductions and credentials, the inspectors explained that it was a routine inspection. Inspectors and the facility representatives then walked through the facility, focusing on the areas and buildings where hazardous wastes are generated and accumulated at the facility.

Walk-Through

There are two cleaning processes at the facility: wet cleaning which uses detergent and water, and dry cleaning which uses perchloroethylene (also known as "perc", and tetrachloroethylene).

Detergent and water from the wet cleaning process is discharged to the local sewer after solids have been removed. There are no chemicals added prior to discharge and no hazardous waste is produced in this process.

Perchloroethylene is the only material used in the two dry cleaning machines and comes off the machines at several points. Used perc and water from clothes is drawn off the machines and pumped into 55-gallon drums which are kept inside polypropylene overpack drums. Both the 55-gallon drums and the overpack drums had hazardous waste labels.

Additional perc and water is vacuumed from the clothes in the dry cleaning machines to dry them. The vapors go to a water separator. Water contaminated with perc from the separator goes into a five-gallon bucket and is managed as a hazardous waste. However, the five-gallon bucket was not labeled or marked with the required hazardous waste information (**Attachment 1, Photo 1**).

Filters from the dry cleaning machines are managed as a hazardous waste, although there were no waste filters onsite at the time of the inspection as they had just been picked up by Foasberg's hazardous waste contractor.

Water condensate and waste oil from an air compressor are managed as hazardous wastes.

Records Review

Inspectors requested the following records: hazardous waste manifests and land disposal notifications; training records; and emergency response information.

No violations were observed with the facility's hazardous waste training program or its emergency response documentation. However, manifests were being copied at the corporate office in response to a City of Long Beach hazardous waste inspection two weeks before the U.S.EPA inspection. U.S.EPA inspectors requested a copy of the manifests when they were sent to the City of Long Beach. No potential violations were observed with these manifests.

An exit briefing was held with the facility representatives at the end of the inspection. U.S. EPA inspectors summarized the preliminary findings.

ADDITIONAL INFORMATION RECEIVED

On November 7, 2003, the facility submitted copies of all manifests for 2002 and 2003 through October 2003. No potential violations were observed with the manifests.

A review of these manifests indicates that the facility generates 2-4 drums of hazardous waste every month. These 2-4 drums weigh less than 1,000 kilograms (2,200 pounds). Consequently, the California regulations applicable to generates of less than 1,000 kilograms per

month apply to this facility.

POTENTIAL VIOLATIONS

The following is a potential violation of the Resource Conservation and Recovery Act (RCRA), as amended; the implementing regulations adopted in the Code of Federal Regulations (CFR), Title 40, Parts 260-266, 268, 270, 273 and 279; the California Health and Safety Code (HSC), Division 20, Chapter 6.5; and the California Code of Regulations (CCR), Title 22, Division 4.5.

RCRA POTENTIAL VIOLATIONS

1. Failure to mark or label satellite accumulation containers as required by 22 CCR §§ 66262.34(e)(1)(C) and (E), and 66262.34(f)(3) [40 CFR § 262.34(c)(1)(ii)].

Additional perc and water is vacuumed from the clothes in the dry cleaning machines to dry them. The vapors go to a water separator. Water contaminated with perc from the separator goes into a five-gallon bucket and is managed as a hazardous waste. However, the five-gallon bucket was not labeled or marked with the required hazardous waste information (**Attachment 1, Photo 1**).

NON-RCRA POTENTIAL VIOLATIONS: None

ATTACHMENTS

1. Photographs



Photo 1 - Five-gallon bucket of perchloroethylene contaminated water
by the water separator behind the dry cleaning machines